

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

| | | |
|------------------------------|---|------------------------|
| KIDANEMARIAM KASSA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | CIVIL RIGHTS COMPLAINT |
| |) | 42 U.S.C. §1983 |
| |) | |
| FULTON COUNTY, GEORGIA, |) | CIVIL RIGHT ACTION NO. |
| PAUL H. HOWARD, officially & |) | 1:17-CV-02068-AT |
| Individually, |) | |
| ANTIONETTE STEPHENSON, |) | |
| individually, PIERRE EASLEY, |) | |
| individually, and JOHN DOE, |) | |
| officially & individually, |) | |
| |) | |
| Defendants. |) | |
| |) | |

**DEFENDANTS PIERRE EASLEY AND ANTOINETTE STEPHENSON'S MOTION TO
FILE AMENDED SPECIAL APPEARANCE MOTIONS TO DISMISS**

COME NOW Defendants Pierre Easley and Antoinette Stephenson, by and through undersigned counsel, and move this Honorable Court to permit amendment of Defendants' previously filed special appearance motions to dismiss. Defendants' proposed amended motions and briefs in support are herein attached as Exhibits "A" through "D". In support of Defendants' motion for leave to amend, Defendants rely upon the attached memorandum of law in support.

Respectfully submitted, this 28th day of September, 2017.

OFFICE OF THE COUNTY ATTORNEY

Patrise Perkins-Hooker
COUNTY ATTORNEY
Georgia Bar No. 572358

Kaye W. Burwell
Deputy County Attorney
Georgia Bar No. 775060

/s/ Ashley J. Palmer
Ashley J. Palmer
Senior Assistant County Attorney
Georgia State Bar No. 603514

OFFICE OF THE FULTON COUNTY ATTORNEY

141 Pryor Street, S.W.
Suite 4038
Atlanta, Georgia 30303
(404) 612-0246 (office)
(404) 730-6324 (facsimile)

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| Defendants. |) | |
| |) | |

CERTIFICATE OF SERVICE

THIS CERTIFIES that on September 28, 2017, I presented this document in Courier New, 12 point type, and that I have electronically filed the foregoing **DEFENDANTS PIERRE EASLEY AND ANTOINETTE STEPHENSON'S MOTION TO FILE AMENDED SPECIAL APPEARANCE MOTIONS TO DISMISS** with the Clerk of Court using the CM/ECF system, and will provide mail notification to the following attorney of record:

Tiffany Williams Roberts
Tiffany W. Roberts, Attorney at Law
Suite 400
235 Peachtree Street
Atlanta, Georgia 30303

This 28th day of September, 2017.

/s/ Ashley J. Palmer

Ashley J. Palmer
Senior Assistant County Attorney
Georgia State Bar No.: 603514

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